

# EXCERPT FROM TRANSCRIPT

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1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE EASTERN DISTRICT OF PENNSYLVANIA

3                               - - -  
4           SIMON CAMPBELL, et al.,           :  
                                  Plaintiffs           :  
  : CIVIL ACTION  
5           vs.                               : NO.  
  : 18-CV-892-JD  
6           PENNSYLVANIA SCHOOL           :  
          BOARDS ASSOCIATION,           :  
7           et al.,                               :  
                                  Defendants.           :

8                               - - -  
9                               Wednesday, May 30, 2018  
10                              - - -

11   Videotaped deposition, taken  
12           pursuant to notice, of MICHAEL FACCINETTO,  
13           taken at the offices of Veritext Legal  
14           Solutions, Sandler Boardroom, 1801 Market  
15           Street, Suite 1800, Philadelphia,  
16           Pennsylvania 19103, beginning at 9:38 a.m.,  
17           before Brigitte A. Strain, a Federally  
18           Certified Registered Professional Reporter  
19           and a Notary Public in and for the  
20           Commonwealth of Pennsylvania.  
21   - - -

22   VERITEXT LEGAL SOLUTIONS  
23   MID-ATLANTIC REGION  
                                  1801 Market Street - Suite 1800  
24   Philadelphia, Pennsylvania 19103

EXHIBIT

D-69

Veritext Legal Solutions

215-241-1000 ~ 610-434-8588 ~ 302-571-0510 ~ 202-803-8830

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1           Q.       Did this make you comfortable  
2       that Bochetto & Lentz had thoroughly  
3       researched the issue before writing this  
4       letter?

5                   MR. BROWN:  Objection.

6                   THE WITNESS:  Honestly, that  
7       didn't strike me at the time.

8       BY MR. COHN:

9           Q.       Do you know anything about  
10       Bochetto & Lentz's reputation for legal  
11       scholarship?

12                   MR. BROWN:  Objection.

13                   THE WITNESS:  I do not, no.

14       BY MR. COHN:

15           Q.       Do you know anything about  
16       Bochetto & Lentz's reputation as bullies?

17                   MR. BROWN:  Objection.

18                   THE WITNESS:  I do not.

19       BY MR. COHN:

20           Q.       Anybody tell you what the  
21       judge's reaction was when it was mentioned  
22       that Bochetto & Lentz was counsel in the  
23       underlying action?

24                   MR. BROWN:  Objection.

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1 THE WITNESS: I don't recall  
2 if they did.

3 BY MR. COHN:

4 Q. Do you remember anybody  
5 telling you about the Christmas card that  
6 the judge recalled receiving one year from  
7 Bochetto & Lentz with an AK 47 on the front  
8 cover of it?

9 MR. BROWN: Objection to  
10 relevance.

11 THE WITNESS: Did not.

12 BY MR. COHN:

13 Q. Was it the intention of PSBA  
14 in retaining Bochetto & Lentz to hire an  
15 aggressive law firm to really teach Simon  
16 Campbell a lesson?

17 MR. BROWN: Objection.

18 BY MR. COHN:

19 Q. You can answer.

20 A. It was relayed to us. I think  
21 we supported hiring an outside firm that  
22 could handle this type of matter. And  
23 that's why we had hired that firm.

24 Q. Do you know that they have a

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1 reputation as SLAPP suit lawyers?

2 MR. BROWN: Objection.

3 THE WITNESS: I do not.

4 - - -

5 (Whereupon the document was  
6 marked, for identification purposes,  
7 as Exhibit Number P-258.)

8 - - -

9 BY MR. COHN:

10 Q. Exhibit P-258, October 25,  
11 2017 e-mail to the Right-to-Know Law address  
12 at the Bethlehem Area School District for  
13 Mr. Campbell. "Subject: New objector  
14 resolution passes in Clarion County." Have  
15 you seen this one before?

16 A. I have.

17 Q. It says, "Please forward this  
18 e-mail to your School Board and your  
19 solicitor. Thank you".

20 Do you know whether or not  
21 this e-mail was provided to the School  
22 Board?

23 A. I don't recall. If that was  
24 the direction we were obligated to, then I'm